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Attorneys for the Fire Victim Trustee

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA**

**In re:**

**PG&E CORPORATION,**

-and-

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case No. 3:19-bk-030088 DM

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF HON. ELLEN  
JAMES (RET.) IN SUPPORT OF FIRE  
VICTIM TRUSTEE'S MOTION FOR  
THE PARTIAL WITHDRAWAL OF  
THE BANKRUPTCY REFERENCE  
FOR THE LIMITED PURPOSE OF  
THE APPOINTMENT OF THE HON.  
ELLEN SICKLES JAMES (RET.) AS  
SPECIAL MASTER PURSUANT TO  
FED. R. CIV. PROC. 53**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

JAMES DECL. ISO MOTION  
FOR SPECIAL MASTER

1 I, the Hon. Ellen Sickles James (Ret.), pursuant to section 1746 of title 28 of the United States  
2 Code, hereby declare under penalty of perjury that the following is true to the best of my knowledge,  
3 information and belief:

4 1. In conjunction with the administration of the PG&E Fire Victim Trust (the “**Fire Victim**  
5 **Trust**”), the Hon. John K. Trotter (Ret.), in his official capacity as trustee (the “**Trustee**”) of the Fire  
6 Victim Trust, has proposed that I serve as Special Master to review and implement measures for the  
7 protection of the financial interests of minors and adult persons with a disability in amounts to be paid to  
8 such persons by the Fire Victim Trust in satisfaction of claims against the debtors in the above-captioned  
9 chapter 11 cases. I submit this declaration in support of the Trustee’s *Notice of Motion and Motion for*  
10 *Partial Withdrawal of the Bankruptcy Reference for the Limited Purpose of the Appointment of the Hon.*  
11 *Ellen Sickles James (Ret.) as Special Master Pursuant to Fed. R. Civ. Proc. 53* (the “**Motion**”).

12 2. I am a retired judge having served on the bench for over twenty years, starting in 1976 as  
13 a Municipal Judge in the Mt. Diablo Judicial District of Contra Costa County and, thereafter from 1982  
14 through 1997, in the Contra Costa Superior Court. In 1991, I became the Presiding Judge of the Civil  
15 Division, Contra Costa County Superior Court. Following my retirement from the bench in 1997, I joined  
16 JAMS where I have practiced law as a Neutral since that time. I am an attorney in good standing, licensed  
17 to practice law in the state of California. My curriculum vitae, setting out my nearly fifty years of legal  
18 experience, is annexed hereto.

19 3. As a Superior Court Judge and in prior Special Master assignments, I have presided over  
20 scores of litigation matters involving claims asserted on behalf of minors. I am fully familiar with state  
21 law requirements and practice regarding review of minors’ settlements, restrictions on the payment of  
22 attorneys’ fees, costs and expenses from the proceeds of litigation involving minors and the handling of  
23 funds belonging to minors. My career as a California state court judge and my subsequent career as a  
24 mediator, arbitrator Judge Pro-Tem, and Special Master, have made me well-qualified to resolve issues  
25 that arise in litigation involving minors and persons with disabilities.

26  
27  
28 JAMES DECL. ISO MOTION  
FOR SPECIAL MASTER

1           4.     I am not aware of any reason my impartiality might be questioned in the role of Special  
2 Master for the Fire Victim Trust. Specifically:

3               a.   I am not aware of any personal bias or prejudice concerning any persons who hold claims  
4 against the Trust;

5               b.   I have not had any personal involvement in or association with the PG&E Chapter 11  
6 Cases;

7               c.   I have not expressed any opinion regarding the claims of any persons who hold claims  
8 against the Trust;

9               d.   I do not have any financial interest in the settlement of claims held by persons against the  
10 Trust, nor do I have any other interest that could be substantially affected by the outcome of any claim  
11 determinations made by the Trust; and

12              e.   I am not a fire victim or related to a fire victim in any way, nor am I related to anyone who  
13 may have an interest that would be substantially affected by any person's claim determination.

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16 Dated November 5, 2020.

By: Ellen Sickles James  
Hon. Ellen Sickles James (Ret.)

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JAMES DECL. ISO MOTION  
FOR SPECIAL MASTER